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Plaintiff Zoya Kovalenko

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Attorneys for Defendants

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DEORAS, AKSHAY S. DEORAS, P.C., AND
MARK FAHEY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ZOYA KOVALENKO,

Plaintiff,

v.

KIRKLAND & ELLIS LLP, MICHAEL DE
VRIES, MICHAEL W. DEVRIES, P.C.,
ADAM ALPER, ADAM R. ALPER, P.C.,
AKSHAY DEORAS, AKSHAY S.
DEORAS, P.C., AND MARK FAHEY,

Defendants.

Case No. 4:22-cv-05990-HSG (TSH)

**STIPULATION TO EXTEND TIME FOR
PLAINTIFF TO OBJECT/RESPOND TO
DEFENDANT KIRKLAND & ELLIS LLP'S
FIRST SETS OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION**

[Civil L.R. 6-1(a)]

Assigned to: Hon. Haywood S. Gilliam, Jr.,
Oakland Division
Referred to: Hon. Thomas S. Hixson,
San Francisco Division

STIPULATION TO EXTEND TIME TO
OBJECT/RESPOND TO DEFENDANT KIRKLAND
& ELLIS LLP'S PROPOUNDED DISCOVERY

No. 4:22-cv-05990-HSG (TSH)

Plaintiff Zoya Kovalenko (“Plaintiff”) and Defendant Kirkland & Ellis LLP (Plaintiff and Defendant together, the “Parties”) hereby stipulate under Civil Local Rule 6-1(a) and Federal Rule of Civil Procedure 29(b) to extend the default deadlines for Plaintiff to object/respond to “Defendant Kirkland & Ellis LLP’s Interrogatories to Plaintiff, Set One” and “Defendant Kirkland & Ellis LLP’s Request[s] for Production of Documents to Plaintiff, Set One” (collectively, “Kirkland’s First Sets of Propounded Discovery”). Kirkland’s First Sets of Propounded Discovery are dated August 8, 2023.

On August 23, 2023, the Parties agreed to stipulate to a 30-day extension for Plaintiff to object/respond to Kirkland’s First Sets of Propounded Discovery and agreed to discuss an additional extension if necessary.¹ The default deadlines for Plaintiff to object/respond would be on September 7, 2023. *See* Fed. R. Civ. P. 33(b)(2) & 34(b)(2)(A); *see also* Fed. R. Civ. P. 29 (permitting parties to stipulate to extend time to object/respond). Pursuant to this stipulation of the Parties, the deadline for Plaintiff to object/respond to Kirkland’s First Sets of Propounded Discovery is October 9, 2023. This change will not alter the date of any event or deadline already fixed by Court order. *See* Civil L.R. 6-1(a).

Dated: August 30, 2023

/s/ Zoya Kovalenko
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Plaintiff

¹ Plaintiff believes an additional extension may be necessary to appropriately object/respond to Kirkland’s First Sets of Discovery Requests, which includes an extensive set of 202 requests for production, for a number of reasons. Plaintiff’s attorney is still trying to find local counsel in order to apply to appear *pro hac vice* on Plaintiff’s behalf. *See* Civil L.R. 11-3(a). Plaintiff is still in the process of transitioning the case to her retained counsel. In addition, Plaintiff and her counsel are traveling this week and next. To the extent any additional extension will be necessary, Plaintiff or her counsel, as appropriate, would file with the Court any requisite documentation (e.g., a stipulation, *see* Civil L.R. 6-1(a), or motion, *see* Civil L.R. 6-2(a), as appropriate).

1 Dated: August 30, 2023

ORRICK, HERRINGTON & SUTCLIFFE LLP

2 /s/ Kate Juvinall

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18
19 **CIVIL LOCAL RULE 5-1(h)(3) ATTESTATION**

20 Pursuant to Civil Local Rule 5-1(h)(3), I attest that the other signatory has concurred in
21 the filing of this document.

22 Dated: August 30, 2023

/s/ Zoya Kovalenko

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